

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

In re

Case No. 24-13609-MCR

Smokecraft Clarendon, LLC

Chapter 11

Debtor.

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**SMOKECRAFT CLARENDON, LLC'S WITNESS
AND EXHIBIT LIST FOR HEARING ON VALUATION MOTION**

Comes now Smokecraft Clarendon, LLC (“Smokecraft” or the “Debtor”), by and through undersigned counsel, pursuant to the Protocol for In Person Hearings Before the Honorable Maria Ellena Chavez-Ruark, and submits these lists of witnesses to be called, and exhibits to be introduced into evidence, at a hearing on April 22, 2025:

I. Stipulation

In accord with the foregoing protocol, counsel for Smokecraft and counsel for Capital Bank have conferred concerning exhibits to be introduced at the subject hearing and agreed to further confer in the days between the filing of these lists and the hearing itself. There is a good faith belief a stipulation may be reached as to most (if not all) exhibits, but such is not extant as of present.

II. Witnesses

Smokecraft reasonably anticipates calling the following witnesses to testify at the hearing, in addition to any other witnesses who may be called for purposes of impeachment and/or rebuttal:

1. Andrew Darneille
2. A representative of Capital Bank National Association

III. Exhibits

Smokecraft reasonably anticipates introducing the following exhibits into evidence at the hearing, in addition to those that may be introduced for impeachment and/or rebuttal purposes:

Exhibit No.	Description	Offered	Objection	Admitted
Debtor01	Stipulation (DE #118)			
Debtor02	Exhibit 3 to Capital Bank's brief in opposition to the motion to value (DE #106-1 at pp. 159-162) (not introduced for the truthfulness of the matters asserted therein)			
Debtor03	TriMark Quote			
Debtor04	Trimark Invoice			
Debtor05	Trimark Quote			
Debtor06	GrizForm Invoice 2019-886			
Debtor07	GrizForm Invoice 2019-890			
Debtor08	Myzentek Invoice 40377			
Debtor09	Summary Appraisal Report of Machinery and Equipment for Capital Bank (DE #106-1 at pp. 2-32) (not introduced for the truthfulness of the matters asserted therein)			
Debtor10	E-mail Chain Between Capital Bank's Counsel and Appraiser			
Debtor11	Petition and Schedules (DE #1)			
Debtor12	Deed of Retail Lease by and between KBSIII 2002 Washington, LLC and Smokecraft Clarendon LLC			
Debtor13	Subordination Agreement			
Debtor14	Breakdown of Errors in Capital Bank Exhibit 3 (demonstrative only)			
Debtor15	Project Budget			

Debtor16	Building Plans			
Debtor17	Annotated Building Plans (demonstrative only)			
Debtor18	Photograph			
Debtor19	Summary of Duplications on Capital Bank Exhibit 3 (demonstrative only)			

Additionally, Smokecraft issued various requests for production of documents to Capital Bank, returnable on Monday, January 27, 2025, and has recently asked Capital Bank to supplement the subject production. Should any documents received through such supplementation prove salient to the valuation hearing, Smokecraft will seasonably supplement this exhibit list.

Respectfully submitted,

/s/ Maurice B. VerStandig
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Counsel for the Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of April, 2025, a copy of the foregoing was served electronically upon filing via the ECF system on all counsel who have entered an appearance herein, including:

- Corinne Donohue Adams cadams@yvslaw.com, cadams@yvslaw.com;jbeckman@yvslaw.com;pgomez@yvslaw.com;vmichaelides@yvslaw.com;yvslawcmecf@gmail.com;r39990@notify.bestcase.com
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